

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	Case No. 8:22CV-240
)	
Plaintiff,)	
)	
vs.)	ANSWER TO
)	AMENDED COMPLAINT
2020 MCLAREN 600LT SPIDER, ET AL.,)	FOR FORFEITURE
)	
Defendant.)	

COMES NOW Claimant, Jeffrey Stenstrom, and for his answer provides the following:

1. Paragraph One is admitted to the extent that it just identifies the code provisions relied upon by Plaintiff in bringing this action. Claimant does not admit that forfeiture is appropriate.

2. Paragraph Two is admitted.

3. Paragraph Three is admitted.

4. Paragraph Four is admitted.

5. Paragraph Five is admitted.

6. Paragraph Six is admitted.

7. Paragraph Seven is admitted to the extent that it just identifies the code provisions relied upon by Plaintiff in bringing this action and the Court has jurisdiction to hear such cases. Claimant denies any claim that forfeiture is appropriate.

8. Paragraph Eight is admitted to the extent that it just identifies the code provisions relied upon by Plaintiff in bringing this action. Claimant denies any claim that forfeiture is appropriate. Claimant does not propose that this case should be in a different venue.

9. Paragraph Nine is denied.

10. Paragraph Ten is denied.
11. Claimant is without sufficient information to admit or deny Paragraph Eleven.
12. Claimant is without sufficient information to admit or deny Paragraph Twelve.
13. Paragraph Thirteen is denied.
14. Paragraph Fourteen is denied.
15. Paragraph Fifteen is denied.
16. Paragraph Sixteen is denied.
17. Claimant is without sufficient information to admit or deny Paragraph Seventeen.
18. Paragraph Eighteen is denied.
19. Paragraph Nineteen is denied.
20. Claimant is without sufficient information to admit or deny Paragraph Twenty.
21. Claimant is without sufficient information to admit or deny Paragraph Twenty-One.
22. Paragraph Twenty-Two is denied.
23. Claimant is without sufficient information to admit or deny Paragraph Twenty-Three.
24. Paragraph Twenty-Four is denied.
25. Claimant is without sufficient information to admit or deny Paragraph Twenty-Five.
26. Claimant is without sufficient information to admit or deny Paragraph Twenty-Six.
27. Paragraph Twenty-Seven is denied.

28. Claimant is without sufficient information to admit or deny Paragraph Twenty-Eight.

29. Claimant is without sufficient information to admit or deny Paragraph Twenty-Nine.

30. Paragraph Thirty is denied.

31. Paragraph Thirty-One is admitted.

32. Claimant is without sufficient information to admit or deny Paragraph Thirty-Two.

33. Paragraph Thirty-Three is admitted.

34. Claimant is without sufficient information to admit or deny Paragraph Thirty-Four (a), (b), (c), (d), (e), (g), (h), (i), (j), (k), (l), (m), (n), (o), and (p). Paragraph Thirty-Four (f) and (q) is denied.

35. Paragraph Thirty-Five is denied.

36. Paragraph Thirty-Six is denied.

37. Paragraph Thirty-Seven is denied.

38. Paragraph Thirty-Eight is denied.

39. Paragraph Thirty-Nine is denied.

40. Paragraph Forty is denied.

41. Paragraph Forty-One is denied.

42. Claimant is without sufficient information to admit or deny Paragraph Forty-Two.

43. Paragraph Forty-Three is denied.

44. Claimant is without sufficient information to admit or deny Paragraph Forty-Four (a), (c), and (d). Paragraph Forty-Four (b) is denied.

45. Claimant is without sufficient information to admit or deny Paragraph Forty-Five.

46. Claimant is without sufficient information to admit or deny Paragraph Forty-Six.

47. Claimant is without sufficient information to admit or deny Paragraph Forty-Seven.

48. Claimant is without sufficient information to admit or deny Paragraph Forty-Eight (a), (c), (e), (f), (g), (h), and (l). Paragraph Forty-Eight (b), (d), (i), (j), (k), and (m) is denied.

49. Claimant is without sufficient information to admit or deny Paragraph Forty-Nine.

50. Paragraph Fifty is denied.

51. Paragraph Fifty-One is denied.

52. Claimant is without sufficient information to admit or deny Paragraph Fifty-Two.

53. Paragraph Fifty-Three is denied.

54. Claimant is without sufficient information to admit or deny Paragraph Fifty-Four.

55. Paragraph Fifty-Five is denied.

56. Paragraph Fifty-Six is denied.

57. Paragraph Fifty-Seven is denied.

58. Claimant is without sufficient information to admit or deny Paragraph Fifty-Eight (c), (d), (e), (f), (g), (h), (i), (j), and (k). Paragraph Fifty-Eight (a), (b), and (l) is denied.

59. Claimant is without sufficient information to admit or deny Paragraph Fifty-Nine.

60. Claimant is without sufficient information to admit or deny Paragraph Sixty.

61. Claimant is without sufficient information to admit or deny Paragraph Sixty-One.

62. Claimant is without sufficient information to admit or deny Paragraph Sixty-Two.

63. Claimant is without sufficient information to admit or deny Paragraph Sixty-Three.

64. Claimant is without sufficient information to admit or deny Paragraph Sixty-Four.

65. Paragraph Sixty-Five is denied.

66. Claimant is without sufficient information to admit or deny Paragraph Sixty-Six.

67. Claimant is without sufficient information to admit or deny Paragraph Sixty-Seven.

68. Paragraph Sixty-Eight is denied.

69. Paragraph Sixty-Nine is denied.

70. Paragraph Seventy is denied.

71. Paragraph Seventy-One is denied.

72. Paragraph Seventy-Two is denied.

73. Paragraph Seventy-Three is denied.

74. Paragraph Seventy-Four is denied.

75. Paragraph Seventy-Five is denied.

AFFIRMATIVE DEFENSES

76. The Defendant money and property was not used in violation of 18 U.S.C. § 1341 and is therefore not forfeitable to the United States pursuant to Title 18, United States Code § 981(a)(1)(C).

77. The Defendant money and property was not used in violation of 18 U.S.C. § 1343 and is therefore not forfeitable to the United States pursuant to Title 18, United States Code § 981(a)(1)(C).

78. The Defendant money and property was not used in violation of 18 U.S.C. §1956 and is therefore not forfeitable to the United States pursuant to Title 18, United States Code § 981(a)(1)(C).

79. The Defendant money and property was not used in violation of 18 U.S.C. § 1957 and is therefore not forfeitable to the United States pursuant to Title 18, United States Code § 981(a)(1)(C).

SECOND AFFIRMATIVE DEFENSE

80. To the extent that either or both Brett Cook or Brian Cook had intentions of using Claimant's money and property for something other than Claimant's understanding, Claimant is an innocent owner of the money.

WHEREFORE, Claimant, Jeffrey Stenstrom prays that Plaintiff's Complaint be denied and that the Defendant property be ordered returned to Claimant along with attorney fees, prejudgment interest, post judgment interest, and travel expenses.

JEFFREY STENSTROM, Claimant,

By: s/Stuart J. Dornan
STUART J. DORNAN, #18553
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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2022, I electronically filed the foregoing document with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Kimberly C. Bunjer, Assistant United States Attorney
Mikala Purdy-Steenholdt, Assistant United States Attorney

and I hereby certify that I have emailed the document to the following non CM/ECF participants:

N/A

s/Stuart J. Dornan

STUART J. DORNAN, #18553

Attorney for Claimant